

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: April 17, 2025 at 10:00 a.m. (ET)

Objection Date: March 24, 2025 at 4:00 p.m. (ET)

**NOTICE OF APPLICATION OF ADVERSARY CLASS ACTION PLAINTIFFS
UNDER SECTIONS 503(b)(3)(D) AND 503(b)(4) OF THE BANKRUPTCY
CODE FOR THE ALLOWANCE OF AN ADMINISTRATIVE
EXPENSE FOR ATTORNEYS' FEES AND EXPENSES**

PLEASE TAKE NOTICE that on the date hereof, Entwistle & Cappucci LLC ("Entwistle & Cappucci"), Lead Counsel for Austin Onusz, Cedric Kees van Putten, Nicholas J. Marshall and Hamad Dar, plaintiffs in the class action adversary proceeding (the "Adversary Class Action Plaintiffs") before this Court on behalf of former customer-depositors of FTX Trading Ltd., West Realm Shires Services Inc., and their affiliated debtors (collectively, the "Debtors"), entitled *Onusz et al. v. West Realm Shires, Inc. et al.*, Adv. Pro. No. 22-50513, filed its *Application of Adversary Class Action Plaintiffs Under Sections 503(b)(3)(D) and 503(b)(4) of the Bankruptcy Code for the Allowance of an Administrative Expenses for Attorneys' Fees and Expenses* (the "Rule 503(b) Application") with the United States Bankruptcy Court for the District of Delaware (the "Court"). The Rule 503(b) Application seeks the allowance of fees in the amount of \$2,539,252 and the reimbursement of expenses in the amount of \$36,693.

PLEASE TAKE FURTHER NOTICE THAT objections, if any, to the Rule 503(b) Application Statement must be made in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. No. 435] entered by the Court (the "Interim Compensation Order"), and are required to be filed on or before March 24, 2025 at 4:00 p.m. (ET) (the "Objection Deadline") with the Clerk of the Court, 3rd Floor, 824 Market Street, Wilmington, Delaware 19801, and must be served on the following parties so it is received by such parties on or before the Objection Deadline:

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063, respectively. Due to the large number of Debtors in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the Debtors' claims and noticing agent's website at <https://cases.ra.kroll.com/FTX>.

1. Counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), (a) Sullivan & Cromwell LLP, 125 Broad Street, New York, New York 10004, Attn: Alexa J. Kranzley (kranzleya@sullcrom.com) and (b) Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, Wilmington, Delaware 19801, Attn: Adam G. Landis (landis@lrclaw.com) and Kimberly A. Brow (brown@lrclaw.com);
2. Counsel to the Ad Hoc Committee of Non-US Customers of FTX.com, (a) Eversheds Sutherland (US) LLP, The Grace Building, 40th Floor, 1114 Avenue of the Americas, New York, New York 10036, Attn: Sarah Paul (SarahPaul@eversheds-sutherland.us);
3. The U.S. Trustee, 844 King Street, Suite 2207, Wilmington, Delaware 19801, Attn: Benjamin A. Hackman (benjamin.a.hackman@usdoj.gov); and
4. Counsel to Katherine Stadler, the fee examiner appointed in the Debtors’ chapter 11 cases, Godfrey & Kahn, S.C., One East Main Street, Suite 500, Madison, Wisconsin 53703 Attn: Mark Hancock (mhancock@gklaw.com).

PLEASE TAKE FURTHER NOTICE THAT, IN ACCORDANCE WITH THE INTERIM COMPENSATION ORDER, IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE INTERIM COMPENSATION ORDER AND THE ABOVE PROCEDURES, THE DEBTORS WILL BE AUTHORIZED TO PAY ENTWISLE & CAPPUCCI THE AMOUNT REQUESTED IN THE RULE 503(B) APPLICATION THAT ARE NOT DISPUTED WITHOUT FURTHER ORDER OF THE COURT. ONLY IF AN OBJECTION IS PROPERLY AND TIMELY FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES (AND IS NOT CONSENSUALLY RESOLVED) WILL A HEARING BE HELD ON THE MONTHLY FEE STATEMENT. ONLY THOSE PARTIES TIMELY FILING AND SERVING OBJECTIONS WILL RECEIVE NOTICE OF, AND BE HEARD AT, SUCH HEARING.

Dated: March 3, 2025
Wilmington, Delaware

**CHIMICLES SCHWARTZ KRINER &
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/s/Scott M. Tucker

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